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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA

3:17-cr-00400-HZ

v.

JASON PAUL SCHAEFER,

Defendant.

**DECLARATION OF STEVEN
COLLINS IN SUPPORT OF
GOVERNMENT'S FURTHER
BRIEFING IN OPPOSITION TO
DEFENDANT'S MOTION TO
SUPPRESS, ECF No. 162**

I, Steven Collins, declare and state as follows:

1. I am a Sergeant in the Portland Police Bureau and the Team Sergeant for the Portland Metropolitan Explosive Disposal Unit (MEDU).

2. I was involved in the execution of the search warrant on the defendant's apartment on October 11, 2017.

3. When we searched defendant's home we found electric matches, black powder and other items that appeared to be explosive-making equipment.

4. As we were searching defendant's apartment, defendant came home, fled, and then detonated an explosive in his car.

5. Members of MEDU responded to the explosion in defendant's car to mitigate any risk from further explosives.

6. During the search of defendant's apartment, we found a business card for a storage facility and suspected that defendant might be storing explosives or an explosive assembly lab at the facility.

7. We were concerned about the public safety threat posed by the items we found in defendant's apartment, the possibility of there being further explosives in defendant's vehicle, and the possibility of more explosives in the storage facility.

8. Once we went to the storage facility and located the unit maintained by defendant, we decided to enter the unit to assess whether there was an immediate threat to public safety.

9. We determined that the contents of the unit did not appear to present an immediate threat and so we secured the unit pending application for a warrant.


10. As of the date of this declaration, I do not recall exactly what time we entered the storage unit but in know that it was later in the evening of October 11, 2017.

11. Between the time defendant detonated an explosive and the time we entered the storage unit, we did not have time to get a warrant for the storage unit. MEDU was extremely

busy addressing matters of urgent public safety presented by defendant's conduct and the items found in his apartment. It would have been impossible to address those safety concerns and also get a warrant before we entered the storage unit.

12. I declare, under penalty of perjury, that the foregoing is true to the best of my knowledge and belief.

Signed and Sworn to: April 30, 2019.


STEVEN COLLINS
Sergeant Portland Police Bureau, MEDU